

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.B.,)	CIVIL ACTION FILE
)	
Plaintiff,)	NO. 1:22-cv-01181-JPB
)	
v.)	
)	
RED ROOF INNS, INC., <i>et al.</i> ,)	
)	
Defendants.)	

**RRI DEFENDANTS' MOTION TO SEAL AND FOR LEAVE TO FILE
UNDER SEAL**

Pursuant to Fed R. Civ. P. 26(c), Fed. R. Civ. P. 5.2(d), and Local Rule 79.1(b) Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC (RRI Defendants) respectfully request to file this Motion to Seal RRI Defendants' Motion to Admit Evidence Under Federal Rule of Evidence 412 and accompanying exhibit under seal. These documents contain personal, medical, and confidential information that would subject parties to substantial injury if made publicly available and further violate the protective order put forth in this case. For the foregoing reasons, the Court should therefore grant this Motion.

A Memorandum in Support of this Motion is contemporaneously filed and incorporated fully.

Dated: October 21, 2024

Respectfully submitted,

/s/ Marcella C. Ducca

Marcella C. Ducca (Ga Bar No. 115079)

Brandon D. Cox (Ga Bar No. 832025)

GREENBERG TRAURIG LLP

Terminus 200

3333 Piedmont Road NE, Suite 2500

Atlanta, GA 30305

Telephone: 678.553.2100

duccam@gtlaw.com

coxb@gtlaw.com

Sandra J. Wunderlich (pro hac vice)

TUCKER ELLIS LLP

100 South Fourth Street, Suite 600

St. Louis, MO 63102-1822

Telephone: 314.256.2550

Facsimile: 314.256.2549

sandra.wunderlich@tuckerellis.com

Chelsea Mikula (pro hac vice)

Joseph A. Manno (pro hac vice)

Elisabeth C. Arko (pro hac vice)

Emily R. Grace (pro hac vice)

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100

Cleveland, OH 44113-7213

Telephone: 216.592.5000

Facsimile: 216.592.5009

chelsea.mikula@tuckerellis.com

joseph.manno@tuckerellis.com

elisabeth.arko@tuckerellis.com

emily.grace@tuckerellis.com

*Attorneys for Defendants Red Roof Inns, Inc.,
FMW RRI I, LLC, and RRI West
Management, LLC*

RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 21, 2024

/s/ Marcella C. Ducca

Marcella C. Ducca

*Attorneys for Defendants Red Roof Inns,
Inc., FMW RRI I, LLC, and RRI West
Management, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, a copy of the forgoing was filed electronically. Service of this filing will be made pursuant to Civ. R. 5(b)(2)(e) through this Court's electronic filing system. Parties may access the filing through the Court's system.

Dated: October 21, 2024

/s/ Marcella C. Ducca _____

Marcella C. Ducca

*Attorneys for Defendants Red Roof Inns,
Inc., FMW RRI I, LLC, and RRI West
Management, LLC*